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17 Allowance Plan for Employees Represented by Local 85 of the Amalgamated Transit Unit

18 UNITED STATES DISTRICT COURT
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA
20 SAN JOSE DIVISION

21 RUTHY PARNES, IN THE RIGHT OF AND) CASE NO. C 06 4165 PJH
22 FOR THE BENEFIT OF VERISIGN INC.,)
23 Plaintiff,)
24 v.)
25 D. JAMES BIDZOS, WILLIAM L. CHENEVICH,)
26 DAVID J. COWAN, DANA L. EVAN,)
27 QUENTIN P. GALLIVAN, MICHELLE)
GUTHRIE, DIANA S. KEITH, ROBERT J.)
KORZENIEWSKI, SCOTT G. KRIENS, LEN J.)
LAUER, ROGER H. MOORE, EDWARD A.)
MUELLER, ANIL H.P. PEREIRA, GREGORY L.)
REYES, WILLIAM A. ROPER, JR., ARNOLD)
SCHAEFFER, STRATTON D. SCLAVOS,)
LOUIS A. SIMPSON, RICHARD A.)
YANOWITCH,)
Defendants,)
and)
VERISIGN INC.,)
Nominal Defendant.)

28 Caption Continued On Next Page

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

1 PORT AUTHORITY OF ALLEGHENY) CASE NO. 5:06-cv-04902-RMW
2 COUNTY RETIREMENT AND DISABILITY)
3 ALLOWANCE PLAN FOR EMPLOYEES)
4 REPRESENTED BY LOCAL 85 OF THE)
5 AMALGAMATED TRANSIT UNION, OF)
6 VERISIGN INC., Derivatively on Behalf of)
7 Nominal Defendant VERISIGN, INC.,)
8 Plaintiff,)
9 v.)
10 D. JAMES BIDZOS, WILLIAM L.)
11 CHENEVICH, DAVID J. COWAN, DANA L.)
12 EVAN, QUENTIN P. GALLIVAN, MICHELLE)
13 GUTHRIE, DIANA S. KEITH, ROBERT J.)
14 KORZENIEWSKI, SCOTT G. KRIENS, LEN J.)
15 LAUER, ROGER H. MOORE, EDWARD A.)
16 MUELLER, ANIL H.P. PEREIRA, GREGORY)
17 L. REYES, WILLIAM A. ROPER, JR.,)
18 ARNOLD SCHAEFFER, STRATTON D.)
19 SCLAVOS, LOUIS A. SIMPSON, RICHARD)
20 A. YANOWITCH,)
21 Defendants,)
22 and)
23 VERISIGN INC.,)
24 Nominal Defendant.)
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1 WHEREAS, there are two related shareholder derivative actions on behalf of nominal
 2 defendant Verisign, Inc. ("Verisign") pending before this Court:

3 Abbreviated Case Name	4 Case Number	5 Date Filed
6 <i>Parnes v. Bidzos, et al.</i>	7 C-06-4165-PJH	8 07/05/06
9 <i>Port Authority v. Bidzos, et al.</i>	10 C-06-4902-RMW	11 09/--/06

12 WHEREAS, the two related Verisign shareholder derivative actions arise out of the same
 13 transactions and occurrences and involve the same or substantially similar issues of law and fact,
 14 and, therefore, should be consolidated for all purposes under Federal Rule of Civil Procedure
 15 42(a);

16 WHEREAS, plaintiffs, after meeting and conferring, agree that Wolf Haldenstein Adler
 17 Freeman & Herz, LLP and Barrack, Rodos & Bacine should be appointed as Lead Counsel;¹ and

18 WHEREAS, plaintiffs and defendants, after meeting and conferring, agree that judicial
 19 economy will be served by setting a schedule for defendants' response to the Consolidated
 20 Complaint.

21 THEREFORE, IT IS STIPULATED AND AGREED by plaintiffs and defendants, through
 22 their respective counsel of record, as follows:

23 **CONSOLIDATION OF ACTIONS**

24 The following actions are hereby consolidated for all purposes, including pretrial
 25 proceedings, trial and appeal:

26 Abbreviated Case Name	27 Case Number	28 Date Filed
29 <i>Parnes v. Bidzos, et al.</i>	30 C-06-4165-PJH	31 07/05/06
32 <i>Port Authority v. Bidzos, et al.</i>	33 C-06-4902-RMW	34 09/--/06

35 1. The caption of these consolidated actions shall be "*In re Verisign, Inc. Derivative*
 36 *Litigation*" and the files of these consolidated actions shall be maintained in one file under Master

37 1 Defendants take no position as to the appointment of Wolf Haldenstein Adler Freeman & Herz,
 38 LLP and Barrack, Rodos & Bacine as Lead Counsel.

1 File No. C-06-4165-PJH. Any other actions now pending or later filed in this Court which arise
2 out of or are related to the same facts as alleged in the above-identified cases shall be consolidated
3 for all purposes, if and when they are brought to the Court's attention.

4 2. Every pleading filed in the consolidated actions, or in any separate action included
5 herein, shall bear the following caption:

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN JOSE DIVISION

9 In re VERISIGN, INC. DERIVATIVE) Master File No. C-06-4165-PJH
10 LITIGATION)
11)
12 This Document Relates To:)
13)
14)
15)
16)
17)
18)
19)
20)

3. When a pleading is intended to be applicable to all actions governed by this Order,
4 the words "All Actions" shall appear immediately after the words "This Document Relates To:" in
5 the caption set out above. When a pleading is intended to be applicable to only some, but not all,
6 of the consolidated actions, this Court's docket number for each individual action to which the
7 pleading is intended to be applicable and the abbreviated case name of said action shall appear
8 immediately after the words "This Document Relates To:" in the caption described above (e.g.,
9 "No. C-06-4165-PJH, *Parnes v. Bidzos, et al.*").

21 4. A Master Docket and a Master File hereby are established for the above
22 consolidated proceedings and for all other related cases filed in or transferred to this Court.
23 Separate dockets shall continue to be maintained for each of the individual actions hereby
24 consolidated, and entries shall be made in the docket of each individual case in accordance with
25 the regular procedures of the clerk of this Court, except as modified by this Order.

26 5. When a pleading is filed and the caption shows that it is applicable to "All
27 Actions," the clerk shall file such pleading in the Master File and note such filing on the Master
28 Docket. No further copies need be filed, and no other docket entries need be made.

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

1 6. When a pleading is filed and the caption shows that it is to be applicable to fewer
2 than all of the consolidated actions, the clerk will file such pleading in the Master File only but
3 shall docket such filing on the Master Docket and the docket of each applicable action.

4 7. When a case which properly belongs as part of *In re Verisign, Inc. Derivative*
5 *Litigation* is filed in this Court or transferred to this Court from another court and assigned to this
6 Court, the clerk of this Court shall:

7 (a) Place a copy of this Order in the separate file for such action;
8 (b) Mail to the attorneys for the plaintiff(s) in the newly-filed or transferred
9 case a copy of this Order and direct that this Order be served upon or mailed to any new
10 defendant(s) or their counsel in the newly-filed or transferred case; and
11 (c) Make an appropriate entry on the Master Docket. This Court requests the
12 assistance of counsel in calling to the attention of the clerk of this Court the filing or transfer of
13 any case which properly might be consolidated as part of *In re Verisign, Inc. Derivative Litigation*.

14 **APPOINTMENT OF LEAD COUNSEL**

15 8. The law firms of Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack,
16 Rodos & Bacine shall be appointed Lead Counsel for plaintiffs in the consolidated *In re Verisign,*
17 *Inc. Derivative Litigation*.²

18 9. Lead Counsel shall have authority to speak for plaintiffs in matters regarding
19 pretrial and trial procedure and settlement negotiations, and shall make all work assignments in
20 such manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid
21 duplicative or unproductive effort.

22 10. Lead Counsel shall be responsible for coordination of all activities and appearances
23 on behalf of plaintiffs and for the dissemination of notices and orders of this Court. No motion,
24 request for discovery or other pretrial proceedings shall be initiated or filed by plaintiffs except
25 through Lead Counsel.

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28 ² Defendants take no position as to the appointment of Wolf Haldenstein Adler Freeman & Herz,
LLP and Barrack, Rodos & Bacine as Lead Counsel.

1 11. Lead Counsel also shall be available and responsible for communications to and
2 from this Court. Lead Counsel shall be responsible for the creation and maintenance of a master
3 service list of all parties and their respective counsel.

4 12. Defendants' counsel may rely upon all agreements made with Lead Counsel, or
5 other duly authorized representatives of plaintiffs, and such agreements shall be binding on
6 plaintiffs.

7 **SCHEDULE RE: FILING CONSOLIDATED COMPLAINT**

8 13. Plaintiffs shall no later than 45 days from the entry of this Order file and serve a
9 Consolidated Complaint, which will supersede all existing complaints filed in these actions.
10 Defendants need not respond to any of the pre-existing complaints. Service, pursuant to Rule 4 of
11 the Federal Rules of Civil Procedure, of any of the pre-existing complaints on any of the
12 defendants, or their counsel, shall constitute sufficient service on that defendant. Service shall be
13 effected with respect to any defendant named in any of the consolidated actions by serving the
14 Consolidated Complaint on that defendant or, with permission, that defendant's counsel.

15 14. Each defendant shall answer or otherwise respond to the Consolidated Complaint
16 no later than 45 days from the date of service. In the event that defendants file and serve any
17 motion directed at the Consolidated Complaint, plaintiffs shall file and serve their opposition
18 within 45 days after the service of defendants' motion. If defendants file and serve a reply to
19 plaintiffs' opposition, they will do so within 30 days after service of the opposition.

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STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

1 15. Defendants need not respond to the initial complaints filed in the above-referenced
2 actions.

3 IT IS SO STIPULATED.

4 DATED: August 30, 2006 WOLF HALDENSTEIN ADLER
5 FREEMAN & HERZ, LLP
6 FRANCIS M. GREGOREK
7 BETSY C. MANIFOLD
8 FRANCIS A. BOTTINI, JR.
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37 Retirement and Disability Allowance Plan for Employees
38 Represented by Local 85 of the Amalgamated Transit Unit

39 STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
40 LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
41 C 06 4165 PJH

1 15. Defendants need not respond to the initial complaints filed in the above-referenced
2 actions.

3 IT IS SO STIPULATED.

4 DATED: August , 2006

5 WOLF HALDENSTEIN ADLER
6 FREEMAN & HERZ, LLP
7 FRANCIS M. GREGOREK
8 BETSY C. MANIFOLD
9 FRANCIS A. BOTTINI, JR.
10 RACHELE R. RICKERT

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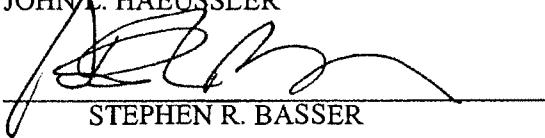
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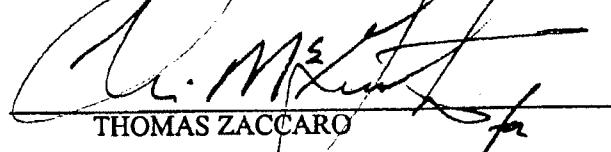
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41 LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
42 C 06 4165 PJH

1 DATED: August 31, 2006

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12 Attorney for Nominal Defendant Verisign, Inc.

13 DATED: August 31, 2006

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23 Korzeniewski, Scott G. Kriens, Len J. Lauer, Roger H.
24 Moore, Edward A. Mueller, Anil H.P. Pereira, Gregory L.
25 Reyes, William A. Roper, Jr., Arnold Schaeffer, Stratton D.
26 Sclavos, Louis A. Simpson, Richard A. Yanowitch

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28 STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

1 Under F.R.C.P. 42(a), the four derivative action cases listed herein are hereby consolidated
2 for all purposes. The law firms of Wolf Haldenstein Adler Freeman & Herz, LLP and Barrack,
3 Rodos & Bacine shall be appointed Lead Counsel for plaintiffs. Plaintiffs shall serve a
4 Consolidated Amended Complaint within 45 days of an order appointing Lead Counsel and
5 Defendants shall file a responsive pleading within 45 days of service of the Consolidated
6 Complaint.

7 **IT IS SO ORDERED**

8 Dated: 10/5/06



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28 VERISIGN:13741.STIP

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

DECLARATION OF SERVICE

I, BORANY REINBOLD, the undersigned, declare:

3 1. That declarant is and was, at all times herein mentioned, a citizen of the United
4 States and a resident of the County of San Diego, over the age of 18 years, and not a party to or
5 interested in the within action; that declarant's business address is 750 B Street, Suite 2770, San
6 Diego, California. 92101.

7 2. That on August 31, 2006, declarant served the **STIPULATION AND**
8 **[PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING**
9 **LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED**
10 **COMPLAINT** via U.S. Mail in a sealed envelope with postage thereon fully prepaid and
11 addressed to the parties listed on the attached Service List.

12 3. That there is regular communication between the parties.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st
14 day of August 2006, at San Diego, California.

Borany Reinbold
BORANY REINBOLD

20 STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES FOR ALL PURPOSES, APPOINTING
LEAD COUNSEL, AND SETTING SCHEDULE FOR FILING OF CONSOLIDATED COMPLAINT - CASE NO.
C 06 4165 PJH

VERISIGN, INC.
Service List -- August 31, 2006
Page 1

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